

Kathy A.F. Davis (#4022)
ASSISTANT ATTORNEY GENERAL
Sean D. Reyes (#7969)
UTAH ATTORNEY GENERAL
1594 W North Temple, Suite 300
Salt Lake City, Utah 84116
kathydavis@agutah.gov
Telephone: (801) 537-9801

Attorneys for Plaintiff State of Utah

**IN THE UNITED STATES JUDICIAL DISTRICT COURT
FOR THE DISTRICT OF UTAH**

IN RE: JOINTLY MANAGED R.S. 2477
ROAD CASES LITIGATION

**UNOPPOSED MOTION TO EXTEND
TIME FOR PLAINTIFFS TO FILE
RESPONSE TO U.S. MOTION TO
ENFORCE**

Case Nos. 2:10-cv-1073

2:11-cv-1043	2:11-cv-1045
1:12-cv-0105	2:12-cv-0423
2:12-cv-0424	2:12-cv-0425
2:12-cv-0426	2:12-cv-0428
2:12-cv-0429	2:12-cv-0430
2:12-cv-0434	2:12-cv-0447
2:12-cv-0461	2:12-cv-0462
2:12-cv-0466	2:12-cv-0467
2:12-cv-0471	2:12-cv-0472
2:12-cv-0477	

Judge: Hon. Clark Waddoups

Plaintiff, the State of Utah (“Plaintiff”), respectfully moves this Court to extend the time to file its response to the United States’ Motion to Enforce the Protections of the Quiet Title Act,

filed in all of the above-captioned cases on Friday, December 6, 2024 (“Motion”). Because Christmas Day falls on a Wednesday, Plaintiff’s response is currently due on Monday, December 30, 2024.

By this motion, Plaintiff respectfully requests the Court to extend Plaintiff’s deadline by six weeks up to and including February 10, 2025. Good cause exists for Plaintiff’s request as overlapping leave throughout the winter holidays has significantly limited the availability of attorneys and support staff. Additionally, attorneys have various competing filing deadlines throughout December and January (including petitions for certiorari in 2:10-cv-1073, due January 31, 2025).

Plaintiffs discussed the requested extension with the United States.¹ The United States will require additional time to prepare its reply, up to and including February 24, 2025. The undersigned is authorized to represent to the Court that the United States does not oppose the request for extension; counsel for Carbon and Kane likewise do not oppose. Proposed order submitted herewith.

DATED this 18th day of December 2024.

UTAH ATTORNEY GENERAL’S OFFICE

/s/ Kathy A.F. Davis
Kathy A.F. Davis
Assistant Attorney General
Attorney for Plaintiff State of Utah

¹ SUWA was copied on correspondence regarding the extension request.